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13  
14 IN THE UNITED STATES DISTRICT COURT  
15 EASTERN DISTRICT OF CALIFORNIA

16 UNITED STATES OF AMERICA,

17 Plaintiff,

v.

18 LEONARDO FLORES BELTRAN, and  
19 SANDRO ESCOBEDO,

20 Defendants.

CASE NO. 2:21-CR-0007-DAD

21 STIPULATION AND ORDER TO CONTINUE  
22 MOTIONS HEARING AND BRIEFING  
SCHEDULE

23  
24  
25  
26  
27  
28 STIPULATION

29 By this stipulation, Plaintiff, the United States of America, by and through its attorney of record,  
30 Assistant U.S. Attorney David W. Spencer, and Defendants Leonardo Flores Beltran and Sandro  
31 Escobedo, by and through their attorneys of record, hereby request to continue the motions hearing set  
32 for February 3, 2025, and the accompanying briefing schedule, as follows:

- 33 1. On December 12, 2024, defendant Rosario Zamora Rojo filed a pre-trial motion to  
34 suppress wiretap evidence, which defendants Sandro Escobedo and Leonardo Flores  
35 Beltran joined. *See* ECF 592 (motion), ECF 602 (Escobedo joinder), ECF 603 (Flores  
36 Beltran joinder).
- 37 2. By stipulation, the motions hearing was set for February 3, 2025, with the government's  
38 opposition due on January 20, 2025, and reply briefs due on January 27, 2025. ECF 606.

3. On January 13, 2025, defendant Zamora Rojo pled guilty and the February 3, 2025, motions hearing was vacated as to defendant Zamora Rojo. ECF 610.
4. The parties have been engaged in plea discussions and believe they are close to finalizing an anticipated resolution. If resolution is reached, the parties anticipate requesting a change of plea hearing on February 3, 2025, or, at the latest, February 10, 2025.
5. The parties hereby jointly stipulate and request that the February 3, 2025, hearing on defendants' pretrial motions (ECF 592, 602, and 603) shall be continued to February 10, 2025. The parties further stipulate and request that the government's oppositions shall be due on January 27, 2025, and any replies shall be due on February 3, 2025.<sup>1</sup>

## IT IS SO STIPULATED.

Dated: January 14, 2025

**MICHELE BECKWITH**  
Acting United States Attorney

Dated: January 14, 2025

/s/ Christopher Cosca  
Christopher Cosca  
Counsel for Defendant  
LEONARDO FLORES BELTRAN

Dated: January 14, 2025

/s/ Michael Heumann  
Michael Heumann  
Counsel for Defendant  
SANDRO ESCOBEDO

<sup>1</sup> By agreeing to this briefing schedule, the government does not waive, and explicitly preserves its position that defendants' motions are untimely and should be denied on that basis alone. The Court ordered all pretrial motions to be filed by November 19, 2024. ECF 506. As the government will further argue in its opposition briefing, its position is that the defendants have not shown good cause for the untimely filing of their pretrial motions, and thus the motions should be summarily denied. See Fed. R. Crim. P. 12(c).

## ORDER

The motions hearing set for February 3, 2025, at 9:30 a.m., for the motions docketed at ECF 592, 602, and 603, is hereby continued to February 10, 2025 at 9:30 a.m. The government's oppositions shall be due on January 27, 2025, and any replies shall be due on February 3, 2025.

IT IS SO ORDERED.

Dated: January 15, 2025

Dale A. Drozd  
DALE A. DROZD  
UNITED STATES DISTRICT JUDGE